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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF TUSAYAN WATER DEVELOPMENT
ASSOCIATION, INC. FOR
ESTABLISHMENT OF RATES FOR
WATER SERVICE.

DOCKET NO. W-02350A-10-0163

IN THE MATTER OF THE APPLICATION
OF ANASAZI WATER CO., LLC FOR
ADJUDICATION “NOT A PUBLIC
SERVICE CORPORATION.”

DOCKET NO. W-20765A-10-0432

IN THE MATTER OF THE APPLICATION
OF HYDRO-RESOURCES, INC. FOR
ADJUDICATION “NOT A PUBLIC
SERVICE CORPORATION.”

DOCKET NO. W-20770A-10-0473

**PRE-FILED DIRECT TESTIMONY OF JOHN W. RUETER
ON BEHALF OF HYDRO-RESOURCES, INC.**

JUNE 20, 2011

Arizona Corporation Commission

DOCKETED

JUN 20 2011

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1 **Q. Please give us your name, employer and occupation?**

2 A. My name is John W. Rueter, and I am employed by Hydro-Resources, Inc.
3 ("Hydro") as President and CEO.

4 **Q. Please describe your work experience, educational background and**
5 **professional affiliations.**

6 A. I first became employed by Hydro in 1995, at which time I had the title of General
7 Manager. I currently hold the position of President and CEO, which I have held
8 since 1999. I am the certified operator for Hydro and oversee all maintenance and
9 operation of Hydro's assets.

10 After receiving my high school degree in Missouri in 1970, I moved to the Grand
11 Canyon area in 1972. I have lived in the Tusayan area for more than 20 years,
12 during the periods of 1973-1980 and 1995 to the present. I have had extensive
13 experience in the water service industry, including construction of water lines,
14 water tanks and wells in northern Arizona, as well as driving water trucks. I have
15 Grade 4 operator certificates from ADEQ in water distribution, water treatment and
16 wastewater treatment, as well as a Grade 3 certificate in water treatment. I also
17 served as chairman of the South Grand Canyon Sanitary District for four years, and
18 I am currently a member of the Town Council for the Town of Tusayan.

19 **Q. What issues will you address in your testimony?**

20 A. I will describe Hydro's history and assets in Tusayan, Arizona; identify Hydro's
21 sources of water; and explain Hydro's relationship with other entities such as the
22 Squire Motor Inns, Inc. ("Squire"), the Tusayan Water Development Association,
23 Inc. ("TWDA"), Anasazi Water Company ("Anasazi") and the other customers of
24 TWDA's in Tusayan. Finally, I will explain why Hydro should not be considered a
25 public service corporation under Arizona law.

26 **Q. Will you be sponsoring any exhibits with your direct testimony?**
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1 A. Yes. I will be sponsoring the exhibits listed on the attached Exhibit List, with the
2 exhibits themselves following the Exhibit List in tabbed order:

3 A. Map of Hydro's water-related assets in Tusayan ("Hydro Assets");

4 B. Map of non-Hydro water-related assets in Tusayan ("Non-Hydro Assets");
5 and

6 C. Map showing all water-related assets in Tusayan.

7 D. List of Hydro's Assets.

8 These maps were prepared from a survey Hydro had conducted of the physical area
9 of the Town of Tusayan, including plotting the water lines and related production
10 and distribution assets, in February, 2011. The survey was conducted by Alisa
11 Templeton, a Registered Land Surveyor with Extreme Measures Land Surveys, Inc.
12 in Flagstaff, Arizona. The data inserted on the survey map is based on information
13 taken from Hydro's business records, and from my personal knowledge based on
14 continuous, first-hand field observation of the matters depicted on the maps. The
15 information overlaid on the survey was prepared directly by me or by Hydro's part-
16 time staff.

17 **Q. In your years with Hydro, have you become familiar with the Company's**
18 **history, assets and operations in Tusayan, Arizona?**

19 A. Yes, I have. During my 16 years of working for Hydro, I have become very
20 familiar with the Company's history, assets and operations. I helped build and
21 install many of the times of physical plant and property. In addition, I have
22 managed Hydro's operations and assets on a daily basis for 16 years. I have
23 participated in virtually all ADEQ inspections of the Hydro assets, and have
24 prepared all reports and testing for ADEQ. I have also submitted all required meter
25 readings and related information to Hydro's customer, TWDA, over these years.

26 **Q. Briefly describe Hydro formation and history.**
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1 A. Hydro is an Arizona corporation created on April 7, 1994. Its original purpose and
2 function was to explore for and secure additional water resources for private
3 businesses owned or operated by Hydro's ownership in Tusayan. Hydro is not the
4 certificated water provider in the Tusayan area and Hydro has never sought a CCN
5 in the Tusayan area. Hydro does not provide water directly to any retail customer in
6 Tusayan. Rather, the certificated water provider in the Tusayan area is TWDA, an
7 entity completely unrelated to Hydro, that had existed as the certificated water
8 provider in Tusayan for many years before Hydro was even created. TWDA was
9 formed in September 1978, and holds a Certificate of Convenience and Necessity
10 ("CCN") from the Commission that was granted in 1979, approximately 15 years
11 before Hydro was even formed. *See* Decision No. 50492 (December 13, 1979).
12 Hydro has always recognized the role of TWDA as the CCN holder and water
13 service provider in Tusayan.

14 As the roles have developed over the years, Hydro's original role of providing water
15 strictly for its related business uses transitioned to a circumstance where Hydro
16 provides water, generally through facilities owned by Hydro or its owners, to
17 TWDA, which in turn sells water received from Hydro to TWDA's customers.
18 TWDA bills its own customers directly for that commodity. There are 32 service
19 connections by which TWDA delivers water developed by Hydro to TWDA's
20 customers.

21 **Q. Briefly describe Hydro's assets in the area of Tusayan, Arizona.**

22 A. Hydro owns one well (with related structures, and pumping and treatment
23 equipment), one storage tank, various segments of transmission and distribution
24 mains and a tanker truck, as well as a number of meters, fire hydrants, tools, pumps,
25 and office equipment, as generally described below:

26 Well and Related Equipment. Hydro owns one well (ADWR # 55-542928) which
27 was drilled in 1994 and is located on land leased from Hydro's owners. The well is
28

1 approximately 3,200 feet deep and produces 65-80 gallons per minute. The well is
2 equipped with a 75 horsepower pump and liquid chlorination equipment, and is
3 surrounded by a security fence. During the 13 month period of Feb. 2010 to Feb.
4 2011, the well produced more than 23.5 million gallons of water. The location of
5 Hydro's well (which is known as "Tusayan #2") is identified on Exhibit A to this
6 testimony.

7 Storage Tank. Hydro owns one 525,000 gallon storage tank built in 1975 and
8 located on land leased from the Squire southeast of Tusayan. (Squire in turn has a
9 special use permit for the land from the U.S. Forest Service.) Hydro also owns a
10 fire pump, pump house, control shed, and various electrical equipment located near
11 this tank site, which is surrounded by a security fence. In addition to this 525,000
12 gallon storage tank, which it owns, Hydro leases 2 million gallons of storage
13 capacity in a 3 million gallon storage tank separately owned by Squire. The
14 locations of the two storage tanks are identified on Exhibit A to this testimony.

15 Transmission and Distribution Mains. Hydro owns twelve segments of
16 transmission and distribution mains, installed from approximately 1984 to 2000,
17 and totaling 11,808 feet, as listed below:

- 18 • Segment B: 1113 feet of Schedule 40, 8" pipe. This segment runs north
19 along the east side of Highway 64 from the Squire Inn to the
20 McDonald's.
 - 21 • Segment C: 732 feet of C-900 PVC, 8" pipe. This segment also runs
22 north along the east side of Highway 64, from McDonald's to the IMAX
23 highway crossing.
 - 24 • Segment D: 480 feet of Schedule 40, 8" pipe. This segment runs from
25 Segment B west under Highway 64 to serve the IMAX Theatre and
26 Canyon Plaza.
- 27
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- Segment E: 1351 feet of Schedule 40, 6” pipe. This segment runs north along Highway 64 from the IMAX crossing to Halvorson Mobile Home Park.
- Segment F: 313 feet of C-900 PVC, 4” pipe. This segment connects with Segment E at Halvorson Mobile Home Park and goes south to connect with a meter vault at Grand Canyon Camper Village.
- Segment G: 400 feet of Schedule 40 2” pipe. This segment connects with Segment F at the corner of Grand Canyon Camper Village and runs east to connect with structures owned by Logan Luca, LLC.
- Segment H: 2022 feet of Schedule 40, 6” pipe. This segment connects at the Squire Inn and then runs west to connect with the Canyon Pines mobile home area.
- Segment I-1: 532 feet of Schedule 40, 8” pipe. This segment extends from Segment H further to the Canyon Pines interior, along the lower level of the mobile home park.
- Segment I-2: 820 feet of Schedule 40, 8” pipe. This segment extends from Segment H further to the Canyon Pines interior, along the upper level of the mobile home park.
- Segment J: 727 feet of C-900 PVC, 8” pipe. This segment connects Segment H and heads roughly north to connect with Canyon View housing and other entities.
- Segment K: 318 feet of C-900 PVC, 8” pipe. This segment connects Hydro’s well, Tusayan #2, through mains owned by Canyon Plaza.
- Segment L: 430 feet of C-900 PVC, 4” pipe. This segment from the Squire’s loop connects with the Arizona Department of Transportation’s water facilities at the Grand Canyon National Park Airport.

1 The segments of mains owned by Hydro are shown on Exhibit A, attached to this
2 testimony. All other sections of transmission and distribution mains in the Tusayan
3 area are owned by other parties.

4 Meters. Hydro owns 24 meters in the Tusayan area. All other meters are owned by
5 other parties.

6 Fire Hydrants. Hydro owns 6 fire hydrants in the Tusayan area, all of which are
7 shown on Exhibit A. All other fire hydrants are owned by other parties.

8 Other Significant Assets. In addition to the assets discussed above, Hydro owns a
9 semi-truck and tanker for hauling water, a backhoe, various structures associated at
10 the well site and storage tank site, tools and work equipment, and office equipment.
11 As noted above, Hydro's well, storage tank and transmission and distribution lines
12 are identified on Exhibit A, attached to this testimony. Hydro has also listed its
13 assets in more detail in Exhibit 1 attached to its March 31, 2011 Responses to Data
14 Requests served by the Staff of the Commission. A slightly amended version of
15 that Asset List is attached as Exhibit D and adopted as part of my testimony.

16 **Q. Besides the well owned by Hydro, does the Company get water from any other**
17 **source?**

18 A. Yes. Hydro also has the right to purchase surplus water from Squire at the price of
19 \$.01772 per gallon, pursuant to a contract with Squire.

20 **Q. Describe Hydro's relationship with Squire.**

21 A. Hydro and Squire are separate companies with common ownership. As noted
22 above, Squire owns a 3 million gallon storage tank. Hydro leases 2 million gallons
23 of that storage capacity. Squire also owns a well, ADWR # 55-523284 (known as
24 Tusayan #1) which produces the water purchased by Hydro from Squire. Squire
25 also owns an individual water distribution system serving itself by linking its well
26 and storage tank to lines providing water service to the Grand Canyon Squire Inn.
27
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1 The locations of Squire's well, tank and distribution system are identified on
2 Exhibit B.

3 **Q. Is Hydro in compliance with all regulations of the Arizona Department of**
4 **Environmental Quality?**

5 A. Yes. Hydro is in compliance with all ADEQ regulations. The ADEQ considers
6 Hydro, together with Squire and other privately-owned systems, to be a single water
7 "system" for environmental regulatory purposes, although the collection of assets is
8 separately owned, has no certificate of convenience and necessity to provide
9 service, and is not a "system" in any real sense.

10 **Q. How does Hydro handle repairs to and maintenance of its water-related**
11 **assets?**

12 A. Hydro is responsible for repair and maintenance of all assets owned by Hydro,
13 including its water lines, well and storage tank. If maintenance or repair is needed
14 on a water line on private property belonging to another person or entity, that party
15 is responsible for the necessary maintenance and repair to its own assets.

16 **Q. How does Hydro pay for its operating expenses?**

17 A. There was an initial capital contribution by Hydro's owners when Hydro was
18 formed. Since that time, Hydro's operations in Tusayan, including repair and
19 maintenance, insurance, salaries, and so on have been funded by the payments
20 received by Hydro from TWDA for bulk, wholesale water Hydro has sold to
21 TWDA.

22 **Q. Is Hydro involved in bringing any new customers onto service?**

23 A No. If and when Hydro receives an inquiry from a party seeking water service,
24 Hydro refers them to TWDA. Hydro understands that TWDA will require the
25 prospective customer to pay membership fee. Hydro's role is then limited to
26 occasional consultations with the TWDA customer's engineers or contractors
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1 concerning water line connections, the individual setting of meters by the TWDA
2 customer, or similar issues.

3 **Q. Does Hydro have any interaction with current customers of TWDA?**

4 A. Hydro may interact with a current customer of TWDA to the extent that the
5 customer has questions about connections to a Hydro-owned line, or about water
6 quality testing results and consumer confidence reports required by ADEQ.

7 **Q. Besides Hydro, does TWDA get water from any other sources?**

8 A. Yes. Hydro is not the only entity that sells water to TWDA. TWDA also purchases
9 water from Anasazi Water Co., L.L.C.

10 **Q. Explain the basis for your knowledge regarding Anasazi Water Company.**

11 A. During the 16 years I have worked for Hydro, I have had frequent opportunity to
12 visit Anasazi's assets and interact with Anasazi's personnel. Hydro has one
13 interconnection with Anasazi's assets, at the request of TWDA.

14 **Q. What is your knowledge about the assets and operations of Anasazi?**

15 A. Anasazi operates as a separate holder of water-related assets that was originally set
16 up to serve the Red Feather Lodge and was later expanded to serve various separate
17 businesses associated with either the Red Feather Lodge or its owners. Anasazi
18 owns one well, ADWR 55-560179, located on land owned by the owners of the Red
19 Feather; a 400,000 gallon storage tank located on United States Forest Service land;
20 and a 3,000 feet distribution line serving the Red Feather Lodge and approximately
21 eight other businesses.

22 Anasazi's well is currently out of service and its future is questionable. Anasazi has
23 chosen to haul in water from Valle, Arizona, by tanker trucks, which are unloaded
24 at a hauled water booster station owned by Anasazi. Anasazi provides only
25 domestic water to its service connections, and has no fire protection capabilities.
26 The locations of Anasazi's well, tank site, booster station and distribution system
27 are identified on Exhibit B.
28

1 **Q. Do you believe that Hydro is a public service corporation?**

2 **A.** No, it is not.

3 **Q. Explain the basis for your position that Hydro is not a public service**
4 **corporation.**

5 **A.** The most significant fact is that Hydro does not directly sell water to any member
6 of the public in Tusayan. Rather, Hydro sells water on a bulk, wholesale basis to
7 TWDA, the regulated CCN holder in the Tusayan area. TWDA then directly sells
8 water to its customers in Tusayan. Because Hydro does not directly sell water to
9 any member of the public, it should not be considered a public service corporation
10 as that phrase is defined in Arizona law.

11 Hydro also should not be considered a public service corporation under any of the
12 other factors considered when deciding this issue. Because Hydro does not sell
13 water directly to the public, its actions do not affect the public in a way which
14 requires Commission regulation and oversight (other than the existing oversight
15 over TWDA, the CCN holder, itself). In addition, the fact that the Commission
16 oversees TWDA, the CCN-holder in the Tusayan area, indicates that the
17 Commission can protect the interests of the public in that manner. Hydro has not
18 dedicated any of its property to the public use. Rather, Hydro uses its water
19 production and distribution assets for its own private purposes, and sells water to
20 TWDA (as does other sellers). Hydro's articles of incorporation do not indicate that
21 it was intended to operate as a public service corporation. Hydro has never sought
22 to monopolize a territory or maintain a monopoly over a commodity; instead,
23 TWDA holds the CCN for Tusayan and has a monopoly over the provision of water
24 service within that territory. Hydro does not accept requests for water service from
25 the public. Instead, members of the public request water service from TWDA, the
26 regulated water service provider. Hydro does not have any contracts with the
27 public, and may chose to refuse to allow any of its private assets to be used in the
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1 provision of TWDA's water service to the public who may request water. Finally,
2 Hydro does not compete with TWDA or any other public service corporation.

3 **Q. Does this complete your prepared direct testimony?**

4 **A. Yes.**

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EXHIBITS

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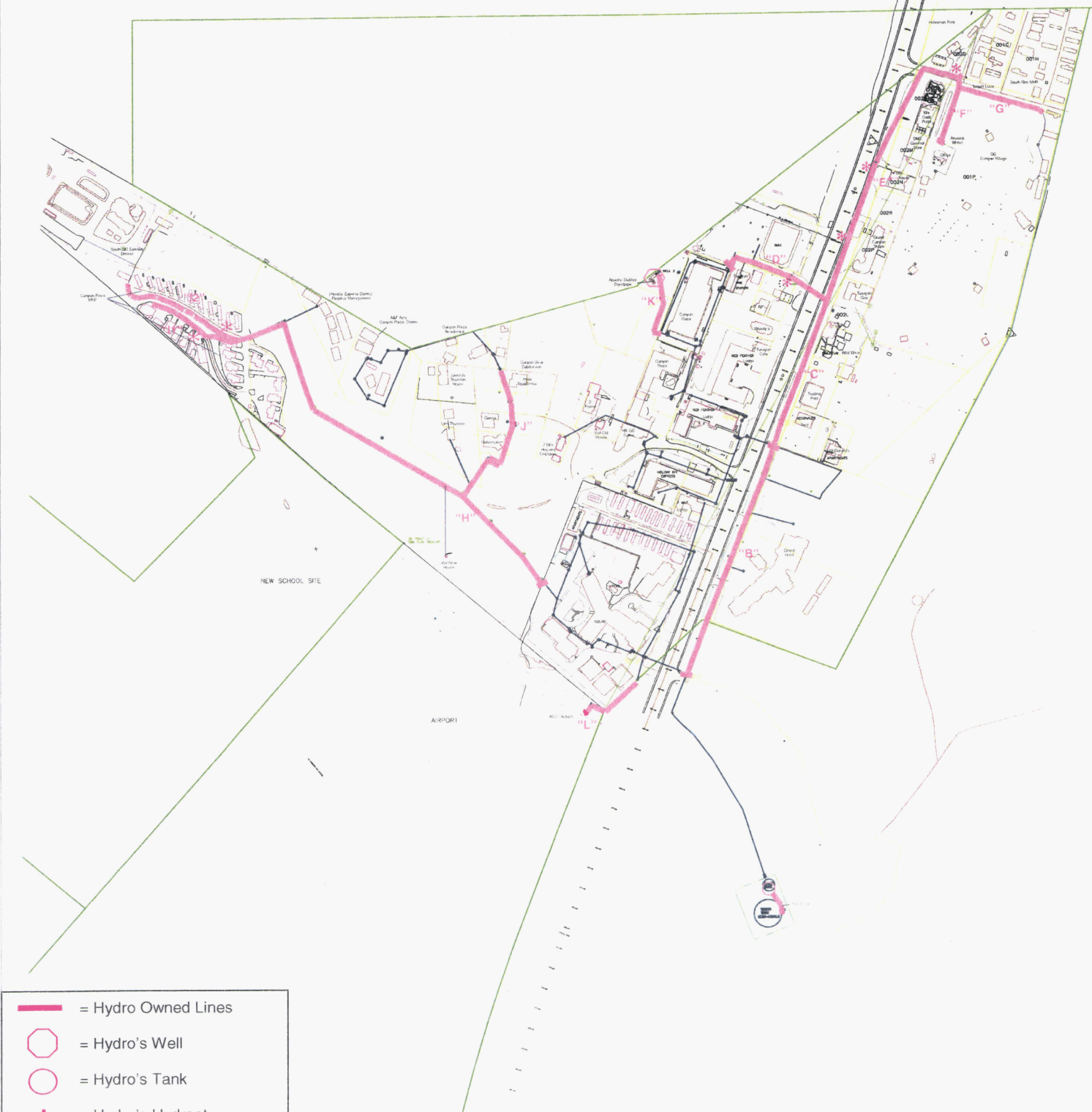
- A. Map of Hydro's Assets in Tusayan ("Hydro Assets")
- B. Map of non-Hydro water-related assets in Tusayan ("Non-Hydro Assets")
- C. Map showing all water-related assets in Tusayan.
- D. Asset List

Exhibit A

HYDRO LINES ONLY



THIS PLOT IS A COMPILATION OF THE COCONINO COUNTY GIS MAP
AN SLIDE SPECIFIC MAP AND EXISTING WATERLINE VALUES.
REVISED AND WATERLINES
8 MARCH 2010



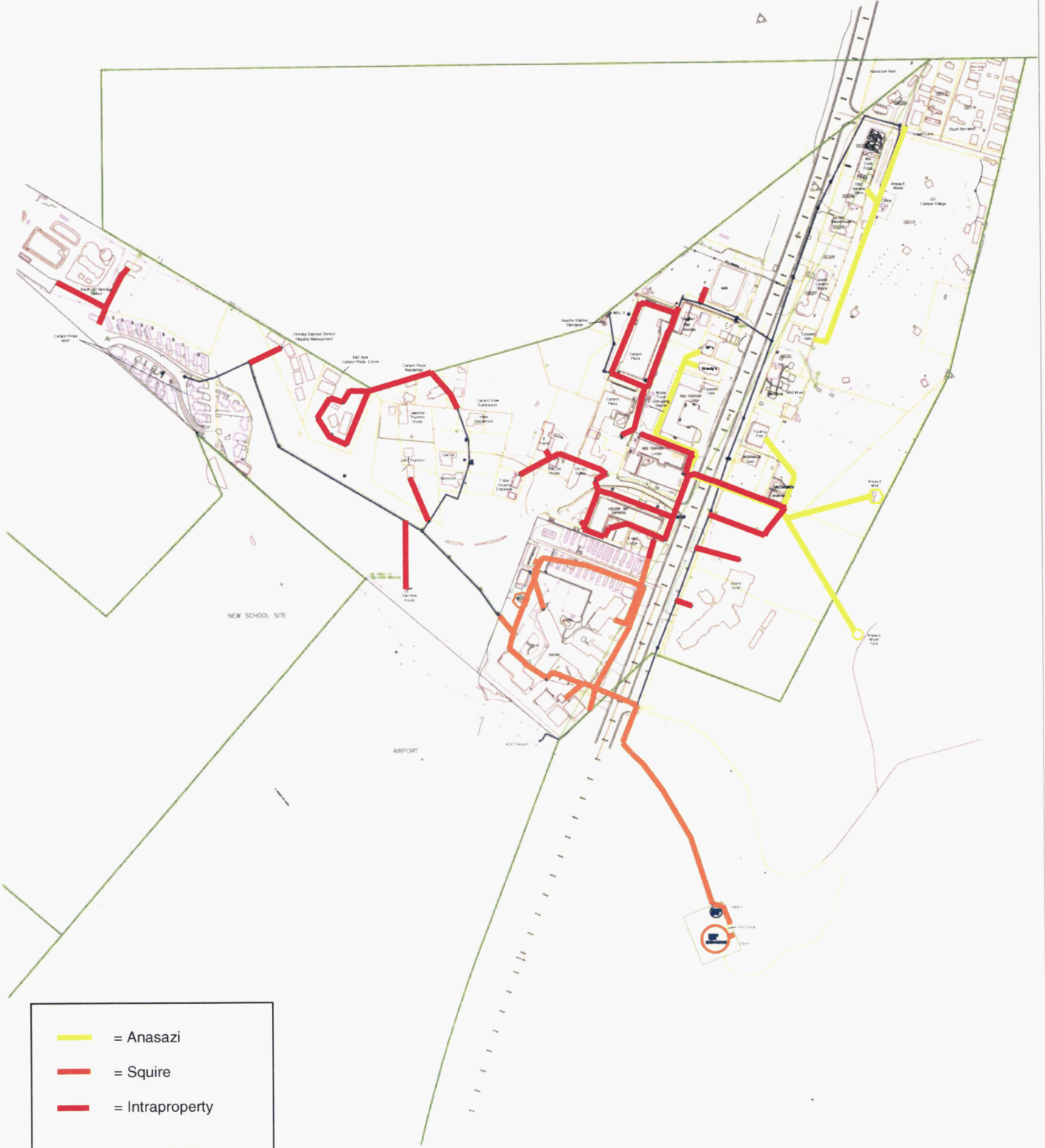
- = Hydro Owned Lines
- = Hydro's Well
- = Hydro's Tank
- = Hydro's Hydrant

Exhibit B

ALL NON-HYDRO LINES



THIS PLAN IS A COMPILED OF THE COCHISE COUNTY GIS MAP
AN AERIAL PHOTOGRAPHIC MAP AND EXISTING WATERLINE VALVES,
WELLS AND WATERLINES.
© MARCH 2010



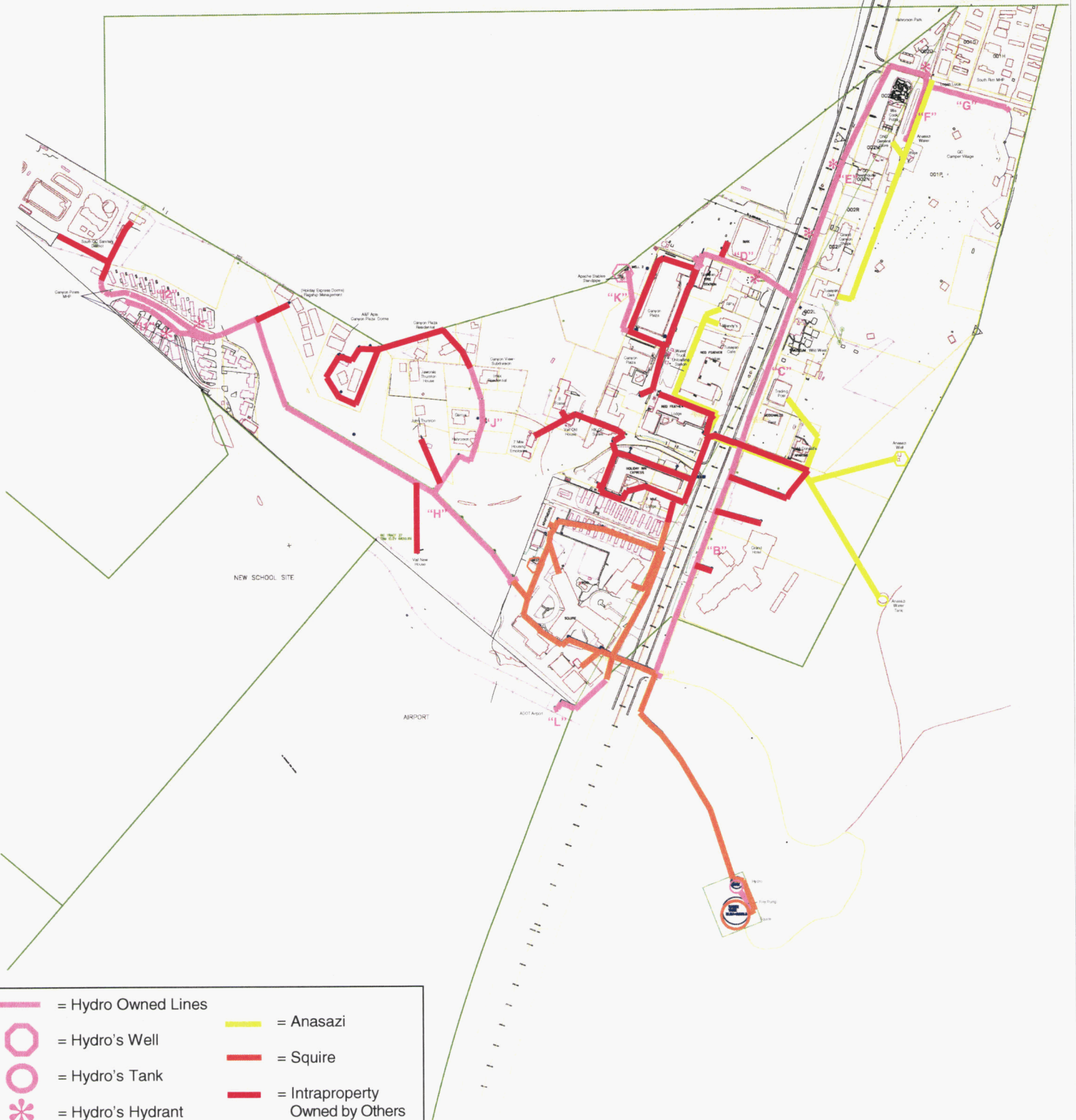
- = Anasazi
- = Squire
- = Intraproperty

Exhibit C

ALL TUSAYAN LINES



THIS PLAN IS A COMPILATION OF THE COCONINO COUNTY GIS MAP, AN AERIAL PHOTOGRAPHIC MAP AND EXISTING RECORD SURVEY, NOTES AND REFERENCES.
8 MARCH 2015



	= Hydro Owned Lines		= Anasazi
	= Hydro's Well		= Squire
	= Hydro's Tank		= Intraproperty Owned by Others
	= Hydro's Hydrant		

Exhibit D

Hydro Resources, Inc.				
Plant-in-Service				
Acct.		Year		
No.	Plant Facilities	Installed	Owned By	Costs
301	Organization	1994		
302	Franchise – none	None	None	
303	Land & Land Rights			
	Well Site #2 (55-542928) Land Lease from Halvorson Seibold		Hydro Resources lease	\$1,500/mo.
	Tank Site – Land Lease from Squire Inn		Hydro Resources lease	
304	Structures & Improvements			
	Well #2(55-542928) – well houses	2006	Hydro-Resources	\$16,000
	Well #2 (55-542928)– fencing	1994	Hydro-Resources	
	Well #2 (55-542928)– standpipe	2006	Hydro-Resources	\$500
	Tank Site – fire pump house	1998	Hydro-Resources	\$150,000
	Accessory Meter/Valve House	1998	Hydro-Resources	
307	Wells & Springs			
	Well #2 (55-542928)– 12" x 3,200 feet, 65-80 gpm.	1994	Hydro-Resources	\$400,000
311	Electric Pumping Equip.			
	Well #2 (55-542928)– 75-Hp well pump at 65 GPM thru 3" meter	2006	Hydro-Resources	\$68,000
320	Water Treatment Equip.			
	Well #2 (55-542928)– Liquid chlorination –chemical pump	2009	Hydro-Resources	\$900.
330	Dist. Reservoir & Standpipe			
	525,000 gallon storage tank	1975	Hydro-Resources	
	Hydro-Resources leases 2 million gallons of storage capacity in a 3 million gallon tank owned by Squire	1991	Hydro-Resources lease	
331	Transmission & Dist. Mains – 9,238 total feet			
	Segment B: 1113 feet of Schedule 40, 8" pipe	1986	Hydro-Resources	
	Segment C: 732 feet of C-900 PVC, 8" pipe	1997	Hydro-Resources	
	Segment D: 480 feet of Schedule 40, 8" pipe	1986	Hydro-Resources	
	Segment E: 1351 feet of Schedule 40, 6" pipe	1992	Hydro-Resources	
	Segment F: 313 feet of C-900 PVC, 4" pipe	2000	Hydro-Resources	
	Segment G: 400 feet of Schedule 40 2" pipe	1984	Hydro-Resources	
	Segment H: 2022 feet of Schedule 40, 6" pipe	1984	Hydro-Resources	
	Segment I-1: 532 feet of Schedule 40, 8" pipe	1984	Hydro-Resources	
	Segment I-2: 820 feet of Schedule 40, 8" pipe	1984	Hydro-Resources	
	Segment J: 727 feet of C-900 PVC, 8" pipe	2000	Hydro-Resources	
	Segment K: 318 feet of C-900 PVC, 8" pipe	1984	Hydro-Resources	
	Segment L: 430 feet of C-900 PVC, 4" pipe	2000	Hydro-Resources	
	5 Road Crossings	1975, 1986, 2000, 2011	Hydro-Resources	
333	Services – One customer, Tusayan Water Development Association, with 32 service connections			
334	Meters – total 24 meters (other meters owned by other parties)			
	11 – 2" meters		Hydro-Resources	
	6 -- 1" meters		Hydro-Resources	
	3 – 5/8" meters		Hydro-Resources	
	2 – 3" meters		Hydro-Resources	
	1 – 1.5" meter		Hydro-Resources	

	1 – 6" meter		Hydro-Resources	
335	Hydrants			
	6 hydrants (all other hydrants are owned by individual property owners)	1984, 1993, 1997	Hydro-Resources	
336	Backflow Prevention Devices – all owned by other parties			
339	Other Plant & Miscell. Equip.			
	34 valves/valve cans (8, 6, 4 and 2 inch)	Various	Hydro-Resources	
	150 kv transformer	1994	Hydro-Resources	
	Controls – ESP CTI, Reda Control Panel	1994	Hydro-Resources	
	3 Manholes	1982	Hydro-Resources	
340	Office Furn. & Improvements			
	2 desks, file cabinets, computer, fax, phone, etc.	2010	Hydro-Resources	\$1,000
341	Transportation Equipment –			
	Semi-truck	1987	Hydro-Resources	
	Tanker	1998	Hydro-Resources	\$10,000
343	Tool & Work Equip.			
	Backhoe	?	Hydro-Resources	?
	Miscellaneous welding equipment	2005	Hydro-Resources	\$5,000
	Handpumps & miscellaneous tools		Hydro-Resources	\$4,800
345	Power Operated Equipment			
	2,500 gpm Diesel-powered fire pump at tank site	1997	Hydro-Resources	\$156,000
346	Communication Equipment (phone & computer listed above)			
	TOTAL:			\$

1 **ORIGINAL and 13 COPIES** of the
2 foregoing filed this 20th day of June,
3 2011, with:

4 Docket Control Division
5 Arizona Corporation Commission
6 1200 W. Washington
7 Phoenix, AZ 85007

8 **COPY** of the foregoing hand-delivered
9 this 20th day of June, 2011, to:

10 Hearing Division
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12 1200 W. Washington
13 Phoenix, AZ 85007

14 Steven M. Olea
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19 Janice Alward, Esq.
20 Chief Counsel, Legal Division
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23 Phoenix, AZ 85007

24 **COPY** of the foregoing mailed this
25 20th day of June, 2011, to:

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